

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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OFFICE OF THE SECRETARY

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service.)	CC Docket No. 97-160
		DA 98-848

COMMENTS OF SPRINT LOCAL TELEPHONE COMPANIES

On May 4, 1998, the Common Carrier Bureau solicited comment on certain issues regarding the forward-looking economic cost mechanism for universal service support. Specifically, the Bureau has requested further comment concerning the input values to be used in the federal mechanism as well as in setting the level of the revenue benchmark.

The Sprint Local Telephone Companies are among the joint sponsors of the Benchmark Proxy Cost Model and, in that capacity, will be filing comments today in concert with its co-sponsors. However, Sprint wishes to offer its individual perspective on the issues involving the cost of installing outside plant and the revenues to be included in the revenue benchmark.

A. Cost of Installing Outside Plant

In its Public Notice, the Common Carrier Bureau requests comment on the cost of installing outside plant as it is currently modeled and calculated by the proxy models under consideration. Specifically, the Bureau has asked for comment on whether it is appropriate to use nation-wide figures or figures

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specific to a state or region when calculating installation costs (Public Notice page 8).

Sprint feels strongly that any proxy model or forward-looking costing methodology chosen by the FCC must accurately reflect the forward-looking costs of providing basic service *as they are actually incurred (or would be incurred)*. Costs must reflect the specific conditions under which the service is provided, because these conditions will cause forward-looking costs to vary, depending on location, regardless of what provider is offering telephone service. To ensure this accuracy, the proxy model should make use of *company-specific costs and conditions* when calculating the cost of basic service.

The reason the models should incorporate company-specific information is two-fold: first, although the models under consideration make use of location-specific geographic factors, it is important to remember that *there are significant location-specific factors that affect costs that are not geographic in nature*. These include different regulatory environments under which any company would have to operate. For instance, in the state of Nevada where Sprint is the local telephone provider, by law the initial cost of trenching for buried cable is borne by developers, not by the telephone company or other utilities. Hence, trenching is not a cost that would be incurred by any efficient provider in Nevada whereas it certainly would be in neighboring Utah.

Second, *the markets for installation services (such as trenching, plowing, etc.) vary significantly by location*. A specific example: the price that any efficient provider would pay for trenching in Kill Devil Hills, North Carolina might be very different than the price for trenching in Raleigh, North Carolina simply because there are more suppliers of trenching services in Raleigh. The two areas might be identical geographically (soil type, depth to water table, etc.) but very different in terms of the actual price a LEC would have to pay for trenching.

The only way for any proxy model to capture accurately all location-specific cost drivers is to look at the data that reflects the actual conditions

under which any efficient provider would have to operate: the cost data of the company serving the specific area in question.

This is not to say that any cost model should reflect embedded investment, book costs, or any other cost that is not forward-looking. Clearly, in the vast majority of cases there will be a large difference between company-specific embedded costs and company-specific forward-looking costs; Sprint has consistently supported the concept of forward-looking costs in all Federal filings. However, Sprint believes it is imperative that the Bureau acknowledge the following: *Any model that assumes the cost of trenching, plowing, etc. does not vary from region to region is incorrect and will produce flawed results. Moreover, the region-specific, topological variables incorporated into the models are, by themselves, insufficient to capture all relative cost drivers. Therefore, it is essential that input values also be used to reflect regional cost differences.*

The Commission acknowledged this fact in its Report and Order in this matter released May 8, 1997. On page 124, footnote 573 the term *forward-looking economic cost* is defined as "...using the least cost, most efficient, and reasonable technology currently available for purchase *with all inputs valued at current prices* (emphasis added)." To the extent that, as mentioned above, the price that the LEC (or any provider) pays for trenching varies from location to location, so too must the economic cost of laying the network.

In order to assist the Bureau in its efforts, Sprint is willing to provide the Bureau with several sets of region-specific input values for the costs of installing outside plant. These values were filed in various state proceedings (both universal service and unbundled element proceedings) as inputs to the Benchmark Cost Proxy Model (BCPM). These input values represent a distribution of costs that reflect the various regional conditions under which any provider would have to operate if it served Sprint's various local territories. The

input values are all consistent with the definition of forward-looking economic cost as defined by the Bureau.

Although the concept of using company-specific data to reflect regional cost differences might seem somewhat daunting, it is important for the Bureau to remember that the BCPM with company specific data has been filed in various state proceedings by Sprint Local Division, U S WEST, Bell South, GTE and SBC. Significant groundwork has already been laid with regard to the use of company specific data in a proxy model.

Sprint also looks forward to assisting the Bureau as it determines an appropriate mechanism for obtaining the actual inputs values to be used in whatever costing methodology is chosen for universal service cost estimation.

B. REVENUES TO BE INCLUDED AND LEVEL OF THE BENCHMARK

The Public Notice seeks comment on the amount of access revenues that should be included in the revenue benchmark. Sprint believes the Public Notice poses the wrong question. The question should not focus on a *revenue* benchmark; the question should instead focus on an *affordability* benchmark. However, if (inappropriately) a revenue benchmark were to be calculated, it is Sprint's position that no access revenue should be included. At page 8 of the Public Notice, the Bureau maintains that, "cost estimated by the proxy models includes the cost of the facilities used to provide [local, discretionary, access, and other] services. . . ." The context would cause the reader to interpret the statement to mean that, since the loop enables other services to be offered, other services should bear a portion of the cost of the loop. There is no sound economic basis for such a notion. The cost of an airline ticket does not include the cost of the

road used to drive to the airport. Likewise, the cost of an enabled service should not be borne by the enabling service.

The Public Notice rightly states that access charges are currently above costs. While the observation is accurate, the conclusion the Commission draws from it is erroneous. At page 9 of the Public Notice, the Bureau concludes that since access charges are above cost, access revenues should be included in the benchmark. Following this course of action would do nothing more than perpetuate an implicit subsidy - which is exactly what the Telecommunications Act of 1996 is trying to eradicate.

In a similar vein, the Notice seeks comment on the inclusion or exclusion of the incremental costs of the services not supported by universal service. Clearly, to design an efficient subsidy system that is targeted, minimized, and efficient, the system should include only the supported services and only the costs of the supported services. To do otherwise would be to cloud the economic and policy issues, make the subsidy larger than it needs to be, make it less efficient, and as a result, more costly to taxpayers.

The Notice asks a corollary question when it seeks comment on whether the proxy models should be modified to include the incremental costs associated with the provision of services that are not supported by universal service but which contribute to the revenue benchmark. To reiterate, efficiency demands targeting and minimization. Neither a (misguided) revenue benchmark nor a

cost proxy should include elements that are not the focus of a policy-driven subsidy system. That concept would extend to any service that is not supported by the universal service policy decisions including intraLATA toll, CCFs, or even business lines.

Good public policy requires that prices be allowed to go (in this case, up) to cost. If other factors necessitate a limitation on that increase, general affordability should be the driver, not revenues. Hardship cases should not dramatically affect the outcome since those situations should be addressed, not here, but in the Lifeline and Link-Up discussion.

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June 1, 1998

CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 1st day of June 1998, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Comments of Sprint Local Telephone Companies" in the Matter of Federal-State Joint Board on Universal Service, CC Docket Nos. 96-45, 97-160, DA 98-848, filed this date with the Secretary, Federal Communications Commission, to the persons on the attached service list.



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